



## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

00-RU-0507

Mr. Philip O. Strawbridge  
Transition Manager  
BNFL Inc.  
3000 George Washington Way  
Richland, Washington 99352

Dear Mr. Strawbridge:

### REGULATORY UNIT (RU) DISAPPROVAL OF AUTHORIZATION BASIS AMENDMENT REQUEST, ABAR-W375-00-00011, UNRESTRICTED AREA DOSE RATES

The RU has completed its evaluation of ABAR-W375-00-00011 which was submitted by letter CCN 013590, from A. J. Dobson, BNFL, to D. C. Gibbs, RL "...Authorization Basis Amendment Request, ABAR-W375-00-00011, Revision 0, 'Unrestricted Area Dose Rates,' Affecting the Safety Requirements Document and the Integrated Safety Management Plan," dated June 13, 2000. The enclosed safety evaluation documents that safety issues have been adequately addressed by the proposed ABAR; but the RU disapproves this ABAR based on the proposed use of outdated documents that are associated with superceded federal regulations.

The ABAR proposes use of Implementing Guide, G-10 CFR 835/B2 as the implementing standard for Safety Criterion (SC) 2.0-3, a radiological SC. Both G-10 CFR 835/B2 and the associated version of 10 CFR 835 have been superceded. Although the portions of the documents germane to the ABAR evaluation have remained the same, the RU can not endorse the use of a standard that is inconsistent with the existing federal regulation, 10 CFR 835, dated November 4, 1998. The RU can approve this ABAR upon updating its regulatory basis.

Nothing in this letter should be construed as changing the Contract (DE-AC27-96RL13308). If you have any questions please contact me or Jeanie Polehn of my staff on (509) 372-0787.

Sincerely,

D. Clark Gibbs, Regulatory Official  
Office of Safety Regulation  
of the RPP-WTP Contractor

REG:JLP

Enclosure

cc w/encl:  
M. P. DeLozier, CHG  
C. Younger, BNFL